

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-cv-5944-JST

MDL No. 1917

This Document Relates to:
All Indirect Purchaser Actions

**[PROPOSED] ORDER GRANTING MOTION
OF COOPER & KIRKHAM, P.C., FOR
APPOINTMENT AS LEAD COUNSEL FOR
INDIRECT-PURCHASER PLAINTIFFS WITH
CLAIMS IN NON-REPEALER STATES**

Judge: Honorable Jon S. Tigar

1 The Motion of Cooper & Kirkham, P.C., for Appointment as Lead Counsel for Indirect-
2 Purchaser Plaintiffs with Claims in Non-Repealer States, filed by Tracy R. Kirkham of Cooper &
3 Kirkham, P.C., came on regularly for hearing on June 6, 2019. The Court, having carefully
4 considered the papers and pleadings on file and oral arguments of counsel, hereby GRANTS the
5 motion. It is hereby ORDERED that:

6 1. Pursuant to Federal Rule of Civil Procedure 23(g)(2)(A), Cooper & Kirkham, P.C.
7 is appointed as Lead Counsel for the Indirect-Purchaser Plaintiffs with Claims in Non-Repealer
8 States.

9 2. Lead Counsel for the Indirect-Purchaser Plaintiffs with Claims in Non-Repealer
10 States shall have the following responsibilities in this proceeding:

- 11 a. To promote the orderly and efficient conduct of this litigation and to avoid
12 unnecessary duplication and unproductive efforts;
- 13 b. To the extent necessary and allowed by the Court, to initiate and conduct all
14 discovery proceedings and communicate with defense counsel with respect to
15 same on all issues;
- 16 c. To initiate all motions, requests for discovery, retention of experts, and other
17 pretrial proceedings regarding the position of all Indirect-Purchaser Plaintiffs
18 with claims in Non-Repealer States;
- 19 d. To meet and negotiate with defense counsel with respect to settlement and other
20 matters after adequate due diligence; and
- 21 e. To advance and protect the interests of putative class members with claims in
22 Non-Repealer States in all respects and to honor all of its responsibilities,
23 including making sure that all representations and commitments made on their
24 behalf are honored.

25 **IT IS SO ORDERED.**

26
27 Dated: _____, 2019

Honorable Jon S. Tigar
United States District Judge